

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KARIM ANNABI

Plaintiff,

vs.

ALEXANDRA-OCASIO CORTEZ,

Defendant.

**No.: 24CV7367**

**COMPLAINT**

**DEMAND FOR JURY TRIAL**

*Pro Se* Plaintiff, Karim Annabi, for and by his Complaint against Defendant, Alexandra-Ocasio Cortez, alleges as follows:

**INTRODUCTION**

1. Plaintiff is a peace activist having founded The Sir David Amess Peace Initiative, and a social entrepreneur having founded a 99% plus profit sharing venture, iactivatelove. Plaintiff's projects are based on views that are a matter of public concern that he wishes to share in public forums, such as Defendant's townhalls. Plaintiff work, moral conscience and civic duty even require him to assemble with other individuals, speak about his views and engage in dialogue, especially when given a chance to participate in a public forum with other socially conscious fellow constituents and the Defendant, a Politician whose job it is to represent him in the U.S. House of Representatives.

2. On May 30<sup>th</sup> and August 8<sup>th</sup>, 2024, however, Defendant blocked Plaintiff from participating in her in-person townhall and telephone townhall, respectively, acts that are unconstitutional and this suit seeks to address these wrongs.

3. Plaintiff also has reason to believe that the Defendant has blocked him from her office's email distribution lists, as since August 8<sup>th</sup>, 2024 he has stopped receiving public information from Defendant that is intended for her constituents.

4. Protecting First Amendment rights are now more important than ever. We are living in

dangerous times at home and abroad where differing religious, political, economic and other ideologies, especially concerning solutions to our common compounding problems, are dangerously dividing the public and leading to extremism and violence. The Black Lives Matter riots, the most destructive in the nation's history, the January 6 attack on Capitol Hill, the on-going wars around the world, the toxic social media environment resulting in a mental health pandemic and the deteriorating planetary environment are just a few of the examples that require us to be open to dialogue, or at a minimum respect each other's rights to assemble and speak freely as enshrined in the U.S. Constitution.

5. Several U.S. Circuit Court of Appeals have upheld that blocking critics at a public forum is a violation of the Constitution. 2<sup>nd</sup> Circuit Judge Barrington D. Parker writes, "The irony in all of this is that we write at a time in the history of this nation when the conduct of our government and its officials is subject to wide-open, robust debate," and that the debate generates a "level of passion and intensity the likes of which have rarely been seen." The decision further reads, "This debate, as uncomfortable and as unpleasant as it frequently may be, is nonetheless a good thing...In resolving this appeal, we remind the litigants and the public that if the First Amendment means anything, it means that the best response to disfavored speech on matters of public concern is more speech, not less."

6. The above opinion is supported by the following tragic example: Then British American NYU President Andrew Hamilton refused to support, personally or institutionally, the Sir David Amess Peace Initiative or honoring Sir David when meeting Plaintiff in March 2022, which is perfectly his prerogative (during an event in which he stated that had not washed his clothes or his hands after touching Singer Taylor Swift when honoring her with an honorary doctorate at the commencement ceremony a few days prior. Ms. Swift, as humanitarian as she may well be, has been alive fewer years than Sir David has been a champion in Parliament). Like the Defendant, Mr. Hamilton went a step further and restricted Plaintiff's freedom of

speech and assembly in New York by having NYU designate him a *Persona Non Grata* on campus under threat of arrest, effectively blocking him from speaking about a peace initiative that promotes tolerance and denounces terrorism. A mere three months later in New York, NYU Professor Sir Salman Rushdie was stabbed 13 times at a public event by a young, Muslim terrorist, a near copy-cat attack to the murder of Sir David. Sir Salman suffered life altering injuries, such as losing an eye and barely escaped with his life.

Furthermore, also at NYU, before the Plaintiff's campus ban became known to campus security, NYU Professor, Islamic Center Director and Imam Khalif Latif sent an imposing individual to put his hands on Plaintiff when he was given the microphone to participate during the Q&A of a Muslim activism in New York themed event, with the instructions to Plaintiff to not mention his peace initiative, restricting his freedom of speech. Imam Latif has also censored the publishing of Plaintiff's prayers for Sir David and Queen Elizabeth following their deaths in the prayers for the deceased section of the NYU Islamic Center's weekly prayers from the community email, simply because his religious views differed. Imam Latif believes that Muslims can't pray for deceased non-Muslims – an intolerant opinion that is hardly universal within the community and is largely cultural. Imam Latif's NYU superiors sided with his insistence on censoring Plaintiff's freedom of speech, and religion, on campus and only watered-down prayers to the surviving family members were published, and not for the deceased themselves as intended.

7. The aforementioned examples are egregious on campus violations of freedom of speech, religion and assembly on matters of public concern, but as NYU is a private university and thus immune to legal accountability for such violations, a citizen's right to engage in peaceful speech and assembly at public forums such as a congressional public town hall regardless of the venue must be protected.

8. Plaintiff respectfully requests that the Court declare that Plaintiff's exclusion from

the public forums organized by the Defendant, in whichever form they may be, violates the First Amendment, and orders that Plaintiff's ability to receive information about, register for and attend these public events be immediately restored.

### **JURISDICTION AND VENUE**

9. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. §§ 2201–2202.

10. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) and (e)(1). The events giving rise to this claim occurred in this district and the Defendant has active offices within the district.

11. Plaintiff resided abroad during the events in question and continues to reside abroad, qualifying this Complaint for Federal diversity status.

### **PARTIES**

#### **Karim Annabi**

12. Plaintiff is a 43-year-old immigrant and United States citizen. He has been a constituent of the Defendant's 14<sup>th</sup> congressional district since 1999 and is eligible to vote absentee for federal office candidates in U.S. primary and general elections.

13. Plaintiff is not a member of, affiliated with, or a recipient of funding from any group, organization, political party or other special interest, foreign or domestic.

14. Plaintiff is a person of good character, has no criminal record in any jurisdiction worldwide and has previously received a security clearance from the U.S. State Department.

15. Plaintiff is a proud New Yorker, a product of the Brooklyn and Queens elementary public-school system and attended CUNY's Manhattan's Hunter College High School, the best public school in the US according to the Wall Street Journal. Plaintiff is also a two-time NYU graduate with honors (Stern BS '03, MBA '10).

16. Plaintiff has maintained decades long friendships with, and is well regarded by, high

level academic and city administrators, such as former NYPD Legal Affairs Commissioner, Andrew Schaffer and current NYU Academic Dean Jonathan White. They state:

It is with great pleasure that I submit this recommendation on behalf of my friend Karim Annabi...he conveys the qualities of strength, dedication, warmth and sincerity, intelligence and discipline. I recommend him highly. - Commissioner Schaffer

I have been overwhelmed by his respectfulness, self-awareness, confidence, and persistent curiosity in both intellectual and personal endeavors...In my personal interactions with Karim, I have been impressed with his consistently amiable demeanor, his commitment to learning, and resourcefulness. He represents a truly valuable asset for the Stern School of Business, and a source of personal pride for me. Karim demonstrates the kind of attributes we in higher education fervently hope to impact to all of our students. - Dean White

17. Plaintiff is the Founder of The Sir David Amess Peace Initiative ([sirdavidamess.com](http://sirdavidamess.com)), created in 2022.

*The Sir David Amess Peace Initiative*

18. Non-remunerative, The Sir David Amess Peace Initiative is the first known interfaith sainthood nomination campaign, hoping to unite people globally of different races, religions and politics behind a symbolic historic act of tolerance and unity that opposes extremism, violence and discrimination, such as antisemitism (through the Jewish association with the project) and islamophobia. The initiative also hopes to shine a light on Sir David's legacy and the example that he set, so that his influence lives on well beyond his untimely death. Lastly, the initiative hopes to uplift the people of the town that he lived and died for, located in one of the more economically disenfranchised regions of the country.

Sir David was a devout Catholic and was often helpful to Plaintiff as his UK Member of Parliament, where he served with distinction for 38 years until his death on October 15, 2021. Sir David was fatally stabbed 21 times by a young Muslim terrorist inside a church during walk-in meetings with the public. Sir David rose from poverty, became a teacher for the disabled, then one of the longest serving and most beloved MP's, championing his town and constituents in unparalleled fashion. He also championed numerous causes such as more opportunities for the disabled, cancer research and animal rights, to name a few. Sir David was

also an interfaith leader in the community, having excellent relations with all faiths, including regularly attending their events and aiding Afghani migrants in his district despite being a Conservative.

The Sir David Amess Peace Initiative has submitted an official interfaith sainthood nomination letter that was accepted by the Catholic Church (as Sir David potentially knew of the threats yet was steadfast in serving the public hands-on according to his beliefs and was killed in gruesome fashion inside a church, he is arguably a martyr and thus exempt from the initial miracle requirement to begin the process). The initiative also seeks to raise £1M to fund the future sainthood investigation, the multiple charities he founded and a local organization he was associated with, The Essex Community Foundation, that gives grants to the vulnerable. The initiative also has a separate secular component allowing everyone to participate, a petition to the U.S. President to award Sir David with an American Presidential Medal of Freedom, an award that is open to foreign nationals and posthumously.

The Sir David Amess Peace Initiative has received praise from leaders within the Catholic Church and the Church of England, as well as interfaith and cross-party political support such as from the United Arab Emirates Islamic Ministry in the form of a *fatwa* or religious ruling, former UK Prime Minister and Labour leader Sir Tony Blair and David Rosen, the former head Rabbi of Ireland and the Jerusalem based Interfaith Director of the American Jewish Committee. The latter two state:

Though on opposite sides I always found him [Sir David] a courteous, decent and thoroughly likeable colleague who was respected across the house. I wish you all the best in your efforts to continue to honour the legacy of Mr. Amess. – Sir Tony Blair

I am also privileged to associate myself with Karim's efforts to honor the memory of Sir David Amess and his exemplary life which was so profoundly in consonance with these ideals and aspirations. - Rabbi David Rosen CGE KSE

19. Plaintiff is also the Founder of "iactivatelove," first registered in 2020 and operational in 2024.

*IACTIVATELOVE*

20. “iactivatelove” is a self-funded, self-operated social enterprise doing business as “Activate.” Activate is comprised of a social network and a fashion label that operate on a 99% plus profit sharing business model, coined “Love Capitalism” by Plaintiff. As there are no investors, profits are shared with all members’ accounts on the network at \$1 per year (to start) to donate or pool using a transfer function, allowing them to crowdfund using company money their grassroots projects that can be posted on a live world map. The remaining profits are divided freely at 1% each with 99 organizations such as teacher, police, nursing, firefighter unions, NGO’s such as Save the Children, environmental organizations such as The World Wildlife Fund, local governments such as the City of New York and celebrity foundations to support their good work while incentivizing their respective celebrities and their billions of followers to join the network, which would generate the promised pay-outs.

The Trevor Noah Foundation was the first invited organization to informally accept its profit allocation. The most recent official ambassador organization, account holder and profit recipient is The First Responders Children’s Foundation, caring for the orphans and families of fallen law enforcement and firefighters nationally.

Plaintiff’s venture is in short a proposal to redefine business success not by the amount of wealth amassed, but by the amount of wealth shared with others, through a voluntary, non-governmental mechanism to redistribute corporate profits with the public. This proposal seeks to unite Americans by employing the best aspects of their two main contrasting philosophies, free market principles and wealth redistribution, to fund not only Americans but also the developing world that is looking to the U.S. for solutions.

**Alexandria Ocasio-Cortez**

21. Defendant is a Democratic Congresswoman representing the 14th District in New York

State, which encompasses parts of the Bronx and Queens. Defendant took an oath of office which includes, “I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States.”

22. Defendant has made a career purporting to champion her constituents, the poor and middle class against the interest of the top 1%, environmental conservation, building a united and stronger America, democratic values and protecting the Constitution.

23. Defendant has previously banned several individuals from her public social media accounts, which, for a government account, the Courts as stated earlier have adjudicated is a public forum and unconstitutional. The ban on her government social media account resulted in Defendant being sued in 2019, which she consequently settled out of court and sincerely apologized for, yet she goes unabated in blocking others from her public forums, such as Plaintiff.

### **FACTUAL ALLEGATIONS**

24. Plaintiff bears no animosity towards the Defendant, whom he rather respects for her inspiring life story and achievements.

25. Plaintiff submits this Complaint along the same principled lines as his UK discrimination lawsuit (to be tried January 6, 2025) against the largest UK Muslim newspaper for violating his rights in denying him the purchase of advertising for The Sir David Amess Peace Initiative fundraiser and instructing him to “never call, text or email the paper again,” while selling the same type of advertising to other fundraisers - freedom of the press in the UK does not allow for discrimination in sales.

26. Plaintiff’s speech blocked by Defendant that was on a matter of public concern is The Sir David Amess Peace Initiative and the economic and technological solutions proposed by the iactivateloventure.

27. Around November 2022, Plaintiff sent Defendant a request for a nomination for The



Zayed Award, a \$1M United Arab Emirates peace prize whose nominators are limited to individuals such as the Defendant. Plaintiff planned to invest the entire prize money into The Sir David Amess Peace Initiative. (Plaintiff does not have a record of the message, as the request was likely sent using an online form on the Defendant website.)

28. On November 30, 2022, Defendant dismissed Plaintiff's nomination proposal:

Mr. Annabi, Thank you for contacting our office for a nomination. Unfortunately, we had to refuse your request because as a congressional office, Sainthood nominations are outside of our purview.

29. On December 5, 2022, Plaintiff respectfully responded to Defendant with a different proposal:

Thanks for your email. I understand your reason for not supporting the interfaith sainthood nomination. Could you instead support my efforts to have President Biden award Sir David Amess with a Presidential Medal of Freedom for his lifetime of heroic work serving the public. This award is not limited to US citizens and can be awarded posthumously. President Biden has awarded a soccer player, a gymnast, an actor, religious leaders, and others so far. Sir David is not only knighted, but was one of the longest ever serving UK MPs and the one of the most beloved. The timing is also important with the UK reeling from the loss of the Queen a few months ago and a well merited American honor of one of her knights, who was killed on the job last year would be a great morale boost, not to mention a show of solidarity against terrorism and political extremism. President Biden honoring a UK Conservative would also be good politics.

30. On December 12, 2022, Defendant's office dismissed Plaintiff's petition proposal:

Thank you for taking your time to reach out to our office regarding the presidential medal. We are sorry and regret to inform you that we have to decline your request. Thank you for understanding.

31. On July 6, 2023, Plaintiff attended Defendant's in-person townhall in the Bronx.

Plaintiff was a courteous member of the audience throughout the event and waited his turn in the line to take a photo and speak briefly with the Defendant.

32. Plaintiff thanked the Defendant for organizing the townhall, declined the photo opportunity and made better use of his short allocation of time to bring some of the aforementioned activism work to the Defendant's attention. The Defendant asked Plaintiff to follow up with one of her staffers who was standing by her side.

33. On February 21, 2024, Plaintiff politely emailed Defendant requesting a meeting:

Hello, I'm a constituent in [from] Astoria. I saw you have social media accounts with Facebook, Twitter, Alphabet, and TikTok, all representing the 1% and corporations that don't pay their fair share in taxes and creating a mental health pandemic of which you are highly critical.

I recently launched a competing social network that is pro-people and planet, with a 99% profit redistribution model to 99 organizations, including the City of New York, UNICEF, Save the Children, NAACP, Feed America, and many many others.

I'm writing to invite you to open an account on the network, so that you can champion this concrete solution for economic equality and social justice indirectly.

Happy to speak more in person or on the phone.

34. On February 22, 2024 Defendant's office emailed Plaintiff rejecting the meeting

request:

Thank you for reaching out to us on behalf of iactivatelove LLC to request a meeting with our office. Unfortunately, we are unable to honor your request at this time. We appreciate the time you took to submit this request. Please feel free to make additional requests in the future by visiting <https://ocasio-cortez.house.gov/scheduling-request>.

35. On March 20, 2024, Plaintiff politely emailed Defendant a following up about

Defendant joining his social network without a meeting:

I'm writing to follow up on my proposal to have Activate, a 99% profit sharing social network, included in the list below, who are owned by the top 1% AOC rails against [&] China. [The email included a picture of the Defendant's social media accounts, Facebook, Instagram, Twitter/X & TikTok.]

36. On April 7, 2024, Plaintiff politely emailed Defendant a second follow up to join the network with a flier that included a testimonial in support by a military veteran. Plaintiff, "I'm writing to follow up on my proposal for your office to join my new social network. Please see the flier attached."

## 99% Profit Sharing is Here

Join a new social network funding the environment, key workers & charities.



"Creating profits is great, but Activate also creates patriots out of everyone. I totally support it." - Dimitri, Military Veteran



37. On April 18, 2024, Plaintiff sent a last follow up email with two pictures, one of her actual Facebook account and a second of her proposed Activate account, to Defendant that included the following message:

Dear Ms. Ocasio-Cortez, I used to be a supporter, but not any longer. You and your office have ignored multiple requests to schedule a meeting to discuss joining a 99% profit sharing social network allocating profits to 99 organizations championing the public including veterans, teachers, police, firefighters, nurses, feeding the hungry (Feed America), helping the homeless (The Salvation Army) and many others. I find it super hypocritical that you use Mark Zuckerberg's Facebook and Elon Musk's Twitter, but refuse to join a 99% profit sharing network launched by someone in your district. Especially in a dangerous election year poised to result in violence from a public frustrated with a deadlock in politics and opposing philosophies.

AOC's Facebook Account



AOC's (Placeholder) Activate Account



38. Defendant's 256k Facebooks followers at its figure of \$68 average revenue per user in North America equates to more than \$17M in revenues for the company, which Activate would allocate \$256k directly to these followers to their accounts, and allocate the remaining 99% of the profits to the 99 invited organizations championing the public and planet. With lower overhead than Facebook, Activate could realistically clear \$100,000 annually to each profit recipient, just from the Defendant's Facebook followers alone.

39. On May 23, 2024, Defendant sent an email to her constituents inviting them to register for her upcoming in-person townhall:

Join Congresswoman Alexandria Ocasio-Cortez in Parkchester for an in-person town hall on Thursday, May 30 at 6 pm. The Congresswoman will provide legislative updates, followed by a Q+A with the audience. Several community partners will be tabling with resources for constituents, so we encourage you to come early to check them out. Doors open at 5 pm."

40. On or about May 23, 2024, Plaintiff registered for the May 30<sup>th</sup> in-person townhall.

41. On May 30, 2024, Plaintiff drove 8 hours from abroad to attend Defendant's in person townhall held inside a public school. Upon arrival, Defendant approached the sign in desk to check in. The staffer found Plaintiff's name on his laptop, but told him that he could not go in because the event had reached capacity.

42. Plaintiff noticed that the other staffers at the desk were signing in attendees who arrived after him and questioned the staffer if it was actually at capacity or rather because had he been blocked from attending. The staffer then admitted to Plaintiff that he had indeed been flagged to not be allowed into the townhall, offering no further explanation as to why.

43. Plaintiff protested respectfully to no avail and resigned to taking a picture near the sign-in desk next to the event's poster and a short video to document not being allowed into the townhall and left the premises.

44. On May 31, 2024, Plaintiff emailed Defendant about being refused entry:

Hello, I was denied entry to yesterday's town hall despite having registered and having attended a previous town hall and spoken to AOC one to one without being disruptive. I imagine your office was not pleased with my last email where I expressed disapproval for your office not returning calls or emails in regards to my request to meet and discuss you office joining a new 99%+ social network. Criticism and feedback from your constituency, however, is part of your function and there was nothing in my emails that would indicate I would be disruptive at an in-person event. I am additionally not pleased with your decision to blacklist me without notice because I drove 8 hours from Montreal directly to the event with two toddlers in the car to participate.

Surely you support a vision for the world where companies at scale, such as social networks, operate on a 99%+ profit sharing model voluntarily, and where key causes such as first responders are funded.

I would like to extend to you the opportunity to make amends and before I inquire into legal remedies.

45. There was no response from the Defendant to the above email.

46. On August 5th, 2024, Defendant sent an email to her constituents inviting them to register for her upcoming telephone townhall, "On Thursday, August 8 at 5:00 pm ET, the Congresswoman will be holding a telephone town hall. She will take questions from her constituents."

47. Plaintiff registered for the Defendant's telephone townhall, receiving a confirmation that included the following instructions, "We will call you, all you have to do is pick up the phone!"

48. On August 8<sup>th</sup>, 2024, Defendant's office did not call Plaintiff to join the telephone townhall.

### **CAUSE OF ACTION**

#### **FIRST CAUSE OF ACTION**

*Violation of the First Amendment of the Constitution Guaranteeing Free Speech & Assembly*

49. Plaintiff hereby incorporates all other paragraphs of this Complaint as if fully set forth herein.

50. At all times relevant to this Complaint, Defendant was acting under the color of law as an elected Congressional Representative.

51. Plaintiff was not disruptive and engaged in First Amendment-protected speech and assembly while attending the Defendant's townhall and sought to engage in additional protected speech and assembly at the denied townhalls.

52. Plaintiff's speech and assembly were on a matter of public concern and did not violate any law.

53. By blocking Plaintiff from her townhalls and emails, Defendant prevented Plaintiff from exercising his First Amendment rights, including his right to speak freely, right to receive information and assemble with other constituents.

54. Defendant's blocking of Plaintiff was an improper viewpoint-based restriction on speech and assembly.

55. Defendant's town halls are designated public forums.

56. Defendant engaged in this conduct intentionally, knowingly, willfully and in reckless disregard of Plaintiff's constitutional rights and has a history doing it to others.

57. Defendant's actions and/or omissions caused, directly and proximately, Plaintiff to suffer damages. The acts and inactions of Defendant caused Plaintiff damages in that he was prevented from speaking freely and assembling with others on matters of public concerns, among other injuries, damages, and losses.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Karim Annabi respectfully requests that this Court enter judgment in its favor and against Defendant Alexandria Ocasio-Cortez, and award him all relief as allowed by law and equity, including, but not limited to the following:

- a. A declaration that Defendant's viewpoint-based blocking of Plaintiff from her townhalls violates his constitutional rights;
- b. An injunction requiring that Defendant unblock Plaintiff from receiving information and attending her townhalls.

c. Punitive damages as the Defendant is a serial violator of the Constitution and pays lip service to being sorry and having learned not to infringe on the public's First Amendment rights.

d. Costs, damages and such further relief as justice requires.

**JURY TRIAL DEMAND**

Plaintiff hereby demands a trial by jury on all claims and issues so triable pursuant to Federal Rule of Civil Procedure 38(a).

Respectfully submitted,

S/Karim Annabi  
Prose Plaintiff  
+447508918352  
35 Priory Crescent  
Southend-on-Sea, UK SS2 6JY

Dated: September 29, 2024